

EXHIBIT A

**PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS**

LOCAL FAKE NEWS GIVES ANGLIN THE HITLER TREATMENT

Andrew Anglin

Daily Stormer

February 17, 2017



Andrew Anglin IRL: No one cared who I was until I typed mean words about Jews on my laptop.

Local fake news in my hometown of Columbus, Ohio harassed me and my family for months before last week publishing an idiotic hoax news story, allegedly based on the accounts of (((confidential sources))).

I had 15 people I went to high school with – and two from elementary school – emailing me like “hm, so you’re a famous Nazi now? Sweet. Some local news reporters are harassing me trying to get dirt on you.”

The outlet, Columbus Alive, an unpopular local “scene” magazine owned by the local Jewish paper the Columbus Dispatch, went so far as to group with the local Anti-Racist Action branch to protest my father, who they claim is a part of a Daily Stormer Aryan conspiracy, because I had a mailbox at his office.

Just to clear up that stupid lie – I have had a mailbox at my dad’s office since I was 18 and moved out of home, because it was easiest to have things mailed there. It’s the address on my driver’s license, my bank account, etc. In today’s world, you rarely need to receive mail, but you still need an address. I moved around a lot, so I just left it there. I used the box for this website, because at the time I started doing it, I didn’t think anything of it. Now I have a PO box – because the sickening filthy Jews called the owners of the building and they threatened to end my father’s lease if I didn’t take the address off the site.

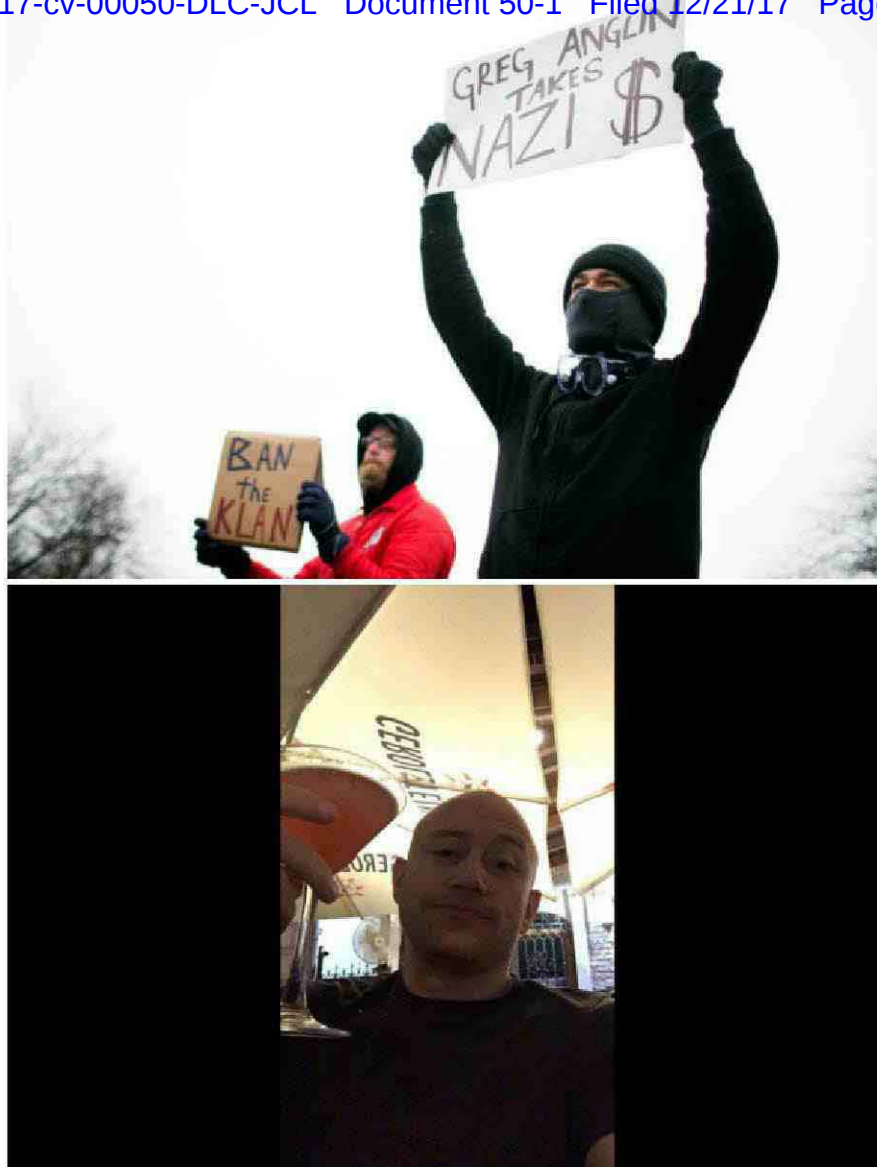
My father does not endorse my politics, but he’s not going to attack his own son, as these people are demanding. They attempt to get your family members to denounce, so they can print that, and act like

they will stop attacking your family if they denounce you. But as we saw in Whitefish with Richard Spencer's mother, saying that you don't agree with your son's politics is not enough.

Anyway, Columbus Alive and other media has linked the mailbox to an overarching Nazi conspiracy, and so they decided to stage a protest against my dad. I'm unclear what role the magazine played in organizing the protest, but at the very least they promoted it to give themselves something to report on. Staging fake protests for fake stories takes fake news into a whole new realm.

Here are the pictures they headed the article with as a slideshow:





One of these things is not like the other, huh?

As in, one of these people looks to be pretty chilled-out and not a complete and total faggot.

Are Nazis actually super chilled-out bros, and anti-Nazis a bunch of smarmy little faggots?

I didn't go to the protest, as I have a real life and business that needs doing, but I'm told those four people were the only ones there.

Anyhow, the article itself is bizarre.

Just to summarize:

I was a street-fighting liberal vegan in JNCOs who listened to shitty punk rock bands and once slammed my head against a sidewalk – because I'm just that hardcore and insane.

To be clear, I only went to high school for a year and a half. It was a liberal art school – I think part of a charter school program, but I can't swear by it. I dropped out, bored, in tenth grade, then reenrolled in a program at the local community college that allowed me to work for high school credits at the same time as college credits, and graduated at 17. So any of the people I knew from high school only knew me at 13 or 14-years-old.

It's obvious they did talk to someone I went to high school with, but some of the stuff is clearly just totally made-up for defamation purposes. I was liberal at that age, as the politics of a 13-year-old go, and I was briefly a vegetarian/vegan around 14 or so, as were most of the people in my class at the liberal art school. I can vaguely remember listening to punk rock music, but I was more into avante garde indie rock. My favorite band as a teenager was Modest Mouse (the fact that the article didn't print that tells me that no one I knew well talked to them; in 9th-10th grade, I was big into getting people with a car to drive me around to see weird indie rock bands – not the Shins though, never even once; actually, I might have seen them once opening for the Modest Mouse sideproject Ugly Casanova in Cleveland). I can't remember wearing JNCOs and hope I never did, but hey – it was 20 years ago. I can't recall every detail.

The public records of marijuana arrests they cite are real. I wrote about this and every other potentially "scandalous" aspect of my life a long, long time ago.

Hitting my head against a sidewalk at a party is just a totally made-up thing. They literally made up a totally fake event to try to smear me as outrageous and insane when I was in my early teens.

But just think of trying to dig up dirt on stuff someone did when they were 13 or 14. That's heavily weird. But this is how they do you when you talk about the Jews. The whole system itself gets unleashed on you, to try and destroy you in any way they can.

I mean, you know what they've done to poor old Uncle Adolf.



Adolf Hitler indulged in sickening sexual fetishes - and even forced his niece to act out his fantasies, according to claims in a US intelligence report

- Sick fantasy was revealed in psychological report on Fuhrer by U.S. spies
- Report said: 'This perversion represents the lowest depths of degradation'
- Claims come after reports that Hitler had a tiny penis and only one testicle

By SIMON TOMLINSON FOR MAILONLINE

PUBLISHED: 03:37 EST, 7 March 2016 | UPDATED: 16:25 EST, 7 April 2016

So this has always been my motto:

"It must, over and over again, be pointed out to the adherents of the movement and in a broader sense to the whole people that the Jew and his newspapers always lie and that even an occasional truth is only intended to cover a bigger falsification and is therefore itself in turn a deliberate untruth. The Jew is the great master in lying, and lies and deception are his weapons in struggle.

Every Jewish slander and every Jewish lie is a scar of honor on the body of our warriors.

The man they have most reviled stands closest to us and the man they hate worst is our best friend.

Anyone who picks up a Jewish newspaper in the morning and does not see himself slandered in it has not made profitable use of the previous day; for if he had, he would be persecuted, reviled, slandered, abused, befouled." -Uncle Adolf

Also, the good doctor:

If someone is attacked by the Jews, that is a sure sign of his virtue. He who is not persecuted by the Jews, or who is praised by them, is useless and dangerous. -Dr. Goebbels

To show the sloppiness of this "journalism" – they referred to my old blog as "True Fascism."

Writing on his blog [True Fascism](#), a precursor to the Daily Stormer first launched in 2012,

As many readers will be aware – and as the first paragraph of my Wikipedia page attests, it was called "Total Fascism."

The Daily Stormer

From Wikipedia, the free encyclopedia

The Daily Stormer is an American **neo-Nazi** and **white supremacist** news and commentary website.^{[1][2]} It is part of the **alt-right** movement.^[3] Its editor is Andrew Anglin, who founded it on July 4, 2013, as a faster-paced replacement for his previous website **Total Fascism**.

Hard to trust the journalistic capacity of someone who can't manage to copy and paste from Wikipedia.

While writing the story, my entire family underwent a campaign of sustained harassment by these fake news "journalists," who I believe were probably working with the SPLC and/or the ADL, given that they tried to involve themselves directly in my father's business dealings, which has been a pattern with these Jewish terrorist groups.

Both the APLC and the ADL were quoted in the article, and I have been made personally aware (though I'm not going to cite the source) that when local news media went to my mother's house and filmed it and put it on TV, that was at the behest of the ADL. Pitcavage called up with the news station and told them he had a big scoop.

And here's the worst part.

They admit to being the ones behind trying to get my father's lease ended.

Meanwhile, Greg Anglin's status as a tenant at 6827 N. High St. remains an open question.

...

Robert McGrath, a senior communications director for CBRE, which manages the Worthington property, said the company was "actively reviewing the situation," but as of press time no decisions had been made.

Reached for comment, Executive House LP, the Quebec-based group that owns the property, said building tenants had been informed that they may not use their space to conduct business on behalf of other organizations since it would violate lease agreements.

"The ownership group of the building has no association to the Daily Stormer," wrote Anthony Ortona, part of Executive House LP's ownership group, in an email to Alive. "Furthermore, there is no lease or rental agreement with this group. They are not a tenant of the building."

They are bragging about tattling to the building owner, like "oooohhh, did you know a Nazi receives mail at your building??? Shouldn't you SHUT IT DOWN???"

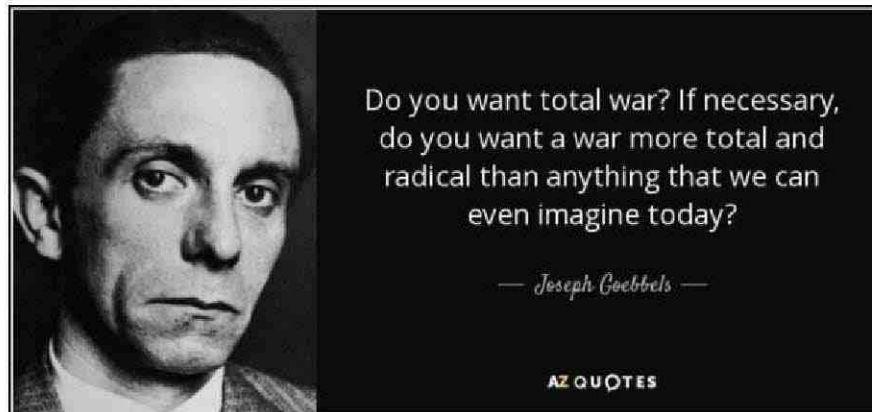
And they do all of this as if they have moral authority.

Because, the moral argument goes, there are certain things no one has a right to say. Even though they do have a right to say them – a right enshrined in the Constitution of the United States of America.

Looking at all of this drama, there is no question whose side the Founding Fathers would be on. It's simply an objective reality that they would side with the Nazis over these moralizing, harassing, whining pieces of shit.

The People Behind the Article

The media is going to attack me no matter what. They are going to try to dig up embarrassing information about me, and when they can't find any – or not enough (the JNCO thing is big if true) – they're just going to make things up. This is what happens.

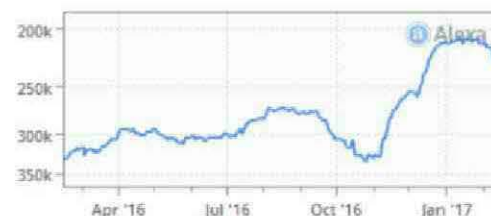


However, I want it to be clear that this is not a one way street. I have an audience that is approximately a thousand times bigger than that of Columbus Alive, and I am going to use this outlet to publish information about people who mess with me and my family.

How popular is columbusalive.com?

Alexa Traffic Ranks

How is this site ranked relative to other sites?



Global Rank

233,588 ▲ 55,903

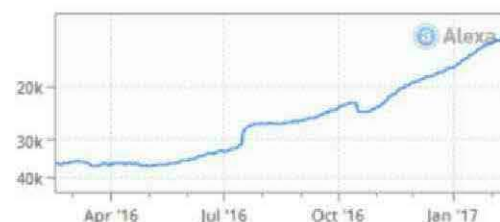
Rank in United States

83,447

How popular is dailystormer.com?

Alexa Traffic Ranks

How is this site ranked relative to other sites?



Global Rank

13,950 ▲ 7,167

Rank in United States

5,077

Only information which is publicly available, of course. Nothing illegal here. We are law-abiding men of conscience.

While being perfectly legal, people probably don't like all of their personal information being posted on a Neo-Nazi website. This is an example of how actions have consequences, and how maybe there are people in the world you just shouldn't fuck with.

The article was written by a team, but the names on it are Joel Oliphint and Andy Downing.

Let's take a look at these two individuals.

SUBJECT #1 : JOEL C OLIPHINT

Joel C Oliphint

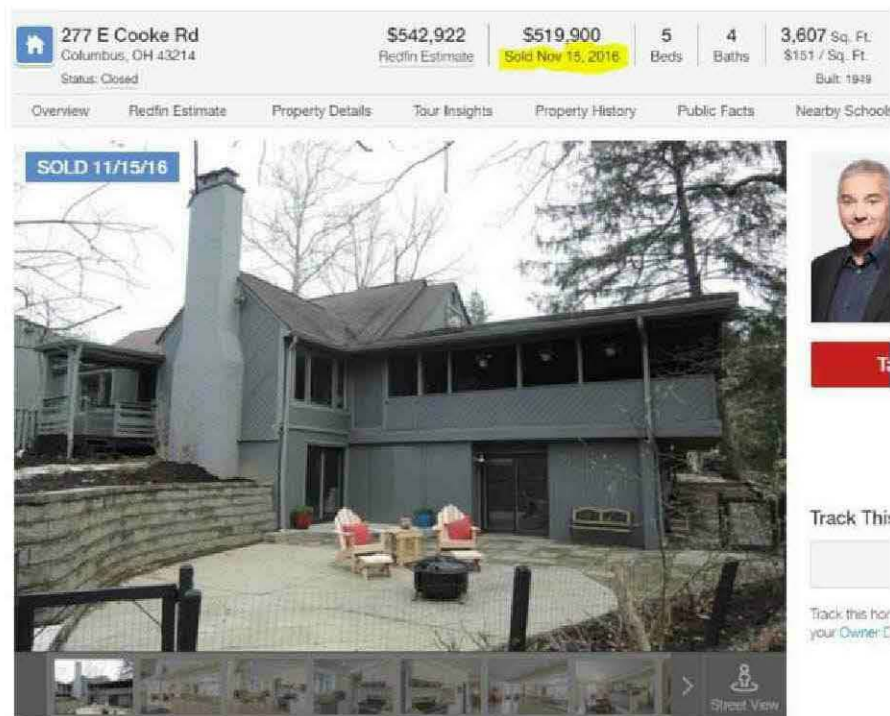
Voter ID: OH0018495680 | Status: Active

DoB: July 03, 1981 (Age 35)

CURRENT ADDRESS:

277 E COOKE RD

COLUMBUS 43214




PREVIOUS ADDRESS:

167 E Beaumont Rd

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[Elections Officials](#)
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[Election Results & Data](#)
[Campaign Finance](#)

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(877) 505-0HIO (767-6446)
TTY (614) 466-0362
Toll-Free TTY (877) 644-6889
E-mail The Office
180 E. Broad St. 16th Floor
Columbus, Ohio 43215



Voter Profile Page

Name: **JOEL C OLIPHINT**

Address: 167 E BEAUMONT RD
COLUMBUS OH 43214


Polling Location: DOMINION MIDDLE SCHOOL
330 EAST DOMINION BOULEVARD
COLUMBUS OH 43214
[\(Get Directions\)](#) *

Precinct: COLS 22-G

US Congressional District: 12

Senate District: 16

State Rep. District: 24


167 E Beaumont Rd
Columbus, OH 43214
Status: Closed

\$301,933
Redfin Estimate

\$308,000
Sold Nov 14, 2016



5
Bedis

2
Baths


1,605 Sq. Ft.
\$188 / Sq. Ft.
Built: 1948

[Overview](#)
[Redfin Estimate](#)
[Property Details](#)
[Tour Insights](#)
[Property History](#)
[Public Facts](#)
[Nearby Schools](#)

SOLD 11/14/16

Street View



Tal

Track This

Track this home
your Owner Da

PERSONAL EMAIL:

joel.oliphint@gmail.com

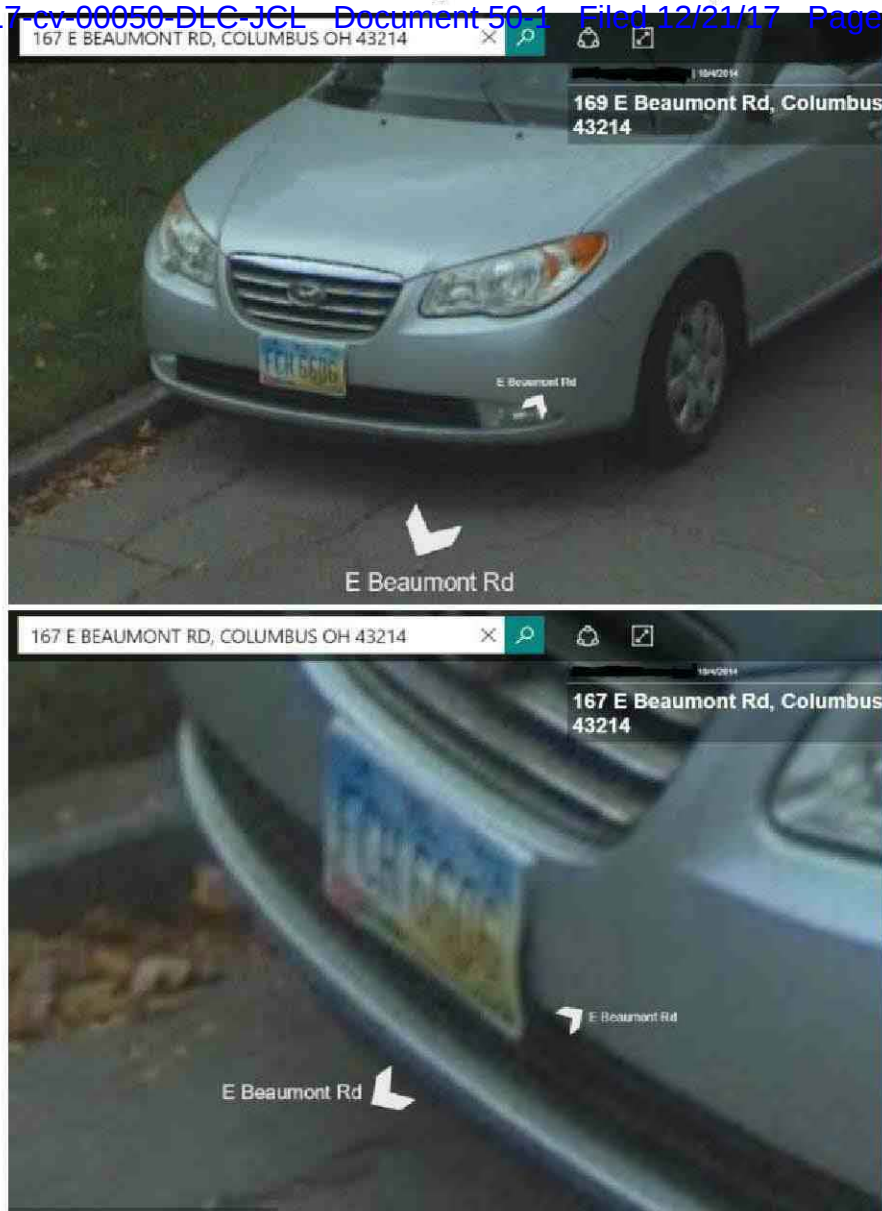
WORK EMAIL:

joliphint@columbusalive.com

VEHICLE:

SILVER 2010 HYUNDAI ELANTRA SEDAN

PLATE #: FCH 6606



FAMILY

Wife: Katy Oliphint

Kate E Oliphint

Voter ID: OH0018495679 | Status: Active

DoB: March 28, 1982 (Age 34)



Voter Profile Page

Name: KATE E OLIPHINT
Address: 277 E COOKE RD
COLUMBUS OH 43214
WHETSTONE RECREATION CENTER
3923 NORTH HIGH STREET
COLUMBUS OH 43214
([Get Directions](#)) *
Polling Location:
Precinct: COLS 19-D
[US Congressional District:](#) 12
[Senate District:](#) 19
[State Rep. District:](#) 22

WORK:

Assistant to Jack Hannah

Jack Hanna's Into the Wild

Kate Oliphint, 614-645-3480

kate.oliphint@columbuszoo.org

Columbus Zoo

9990 Riverside Dr

Powell, OH 43065

Phone: +1.614.645.3480

FAMILY PHOTOS:



Kate Oliphint with Lexi Killoren.

September 24, 2009 · 🌐

Aunt Lexi and Maggie hang out with Liam while he tries out his new potty!



Share

<http://archive.is/6Fuqd>

Kate Oliphint with Joel Oliphint.

October 4, 2009 · 🌐

Maggie was baptized today by her Papaw (Joel's dad). So incredible.



Share

<http://archive.is/aHEFm>



Kate Oliphint updated her profile picture.

October 26, 2013 ·



<http://archive.is/A6Gt9>

KATE'S FACEBOOK

<https://archive.is/RChTX>

CHILDREN:

Son: Liam Oliphint (Age 9)

Daughter: Maggie Oliphint (Age 7)

Mother: Peggy C Oliphint

ADDRESS:

421 Elm AVE

Glenside, PA 19038

PHONE:

(215) 884-3024



<https://archive.is/5ZLQK>

SUBJECT #2 : ANDREW J DOWNING

Andrew J Downing

VOTER ID: OH0024001624

DoB: March 07, 1979 (Age 37)

ADDRESS:

1011 S Roosevelt AVE

Columbus (Bexley area), OH 43209

Voters >

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Precinct Election Officials >

Elections Officials >

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Election Results & Data

Campaign Finance

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TTY (614) 466-0562
Toll-free TTY (877) 644-6889

Email The Office

180 E. Broad St., 16th Floor
Columbus, Ohio 43215

Get ADOBE READER

Voter Profile Page

Name: **ANDREW J DOWNING**

Address: 1011 S ROOSEVELT AVE
COLUMBUS OH 43209

Polling Location: MONTROSE ELEMENTARY SCHOOL
2555 EAST MAIN STREET
COLUMBUS OH 43209
[\(Get Directions\)](#) *

Precinct: BEXLEY 3-A

[US Congressional District:](#) 3

[Senate District:](#) 15

[State Rep. District:](#) 18

PHONE:

(312) 227-3000

Dispatch profile: <https://archive.is/IQRjO>

Address: <https://archive.is/7R2uK>

VEHICLE:

SILVER NISSAN ALTIMA

PLATE #: FZQ 2183



FAMILY

Anne Catherine Downing (nee Haney) (Wife, Age 35)

ADDRESS:

1011 S Roosevelt AVE

Columbus (Bexley area), OH 43209

Address: <https://archive.is/EYffG>

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 Toll-free TTY (877) 644-6889
Email The Office
 180 E. Broad St., 16th Floor
 Columbus, Ohio 43215

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Voter Profile Page

Name: ANNE CATHERINE DOWNING
 Address: 1011 S ROOSEVELT AVE
 COLUMBUS OH 43209
 MONTROSE ELEMENTARY SCHOOL
 2555 EAST MAIN STREET
 COLUMBUS OH 43209
[\(Get Directions\)](#) *
 Polling Location:
 Precinct: BEXLEY 3-A
[US Congressional District:](#) 3
[Senate District:](#) 15
[State Rep. District:](#) 18

**Likely information on Anne C Haney under maiden name*

Anne C Haney

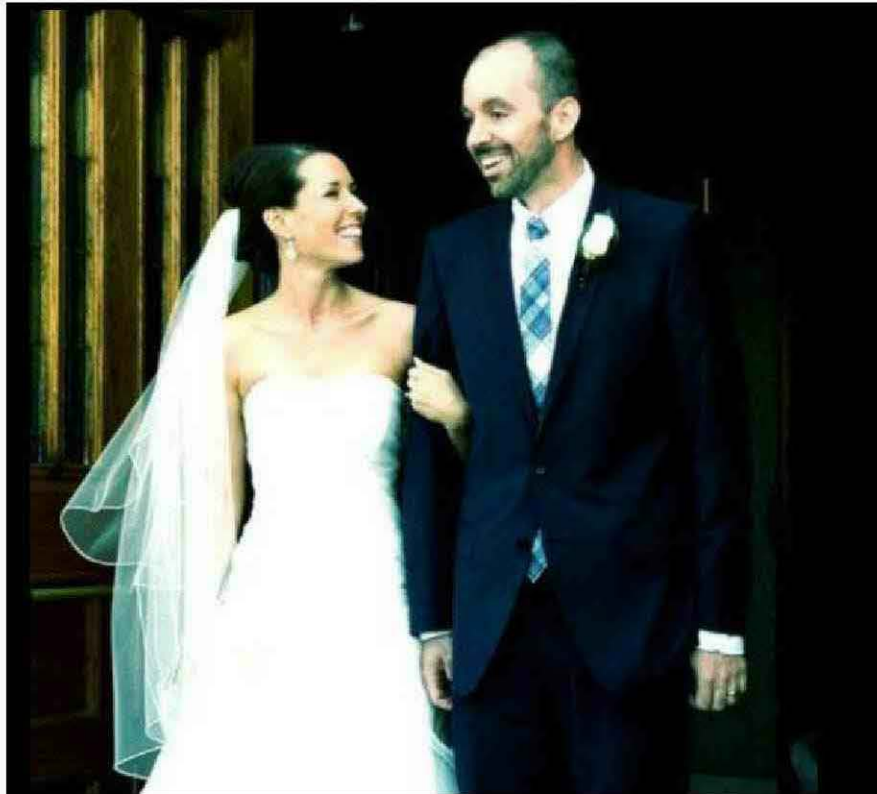
VOTER ID: OH0022647024

DoB: November 05, 1981 (Age 35)

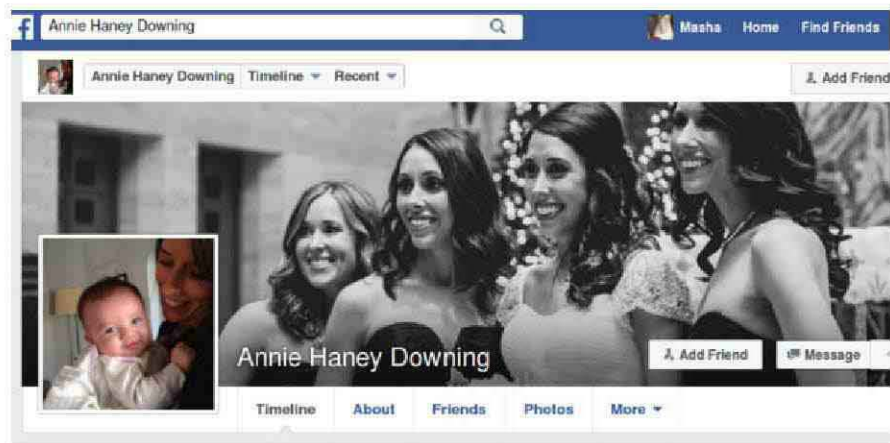
ADDRESS:

1145 BERNARD RD, COLUMBUS OH 43221

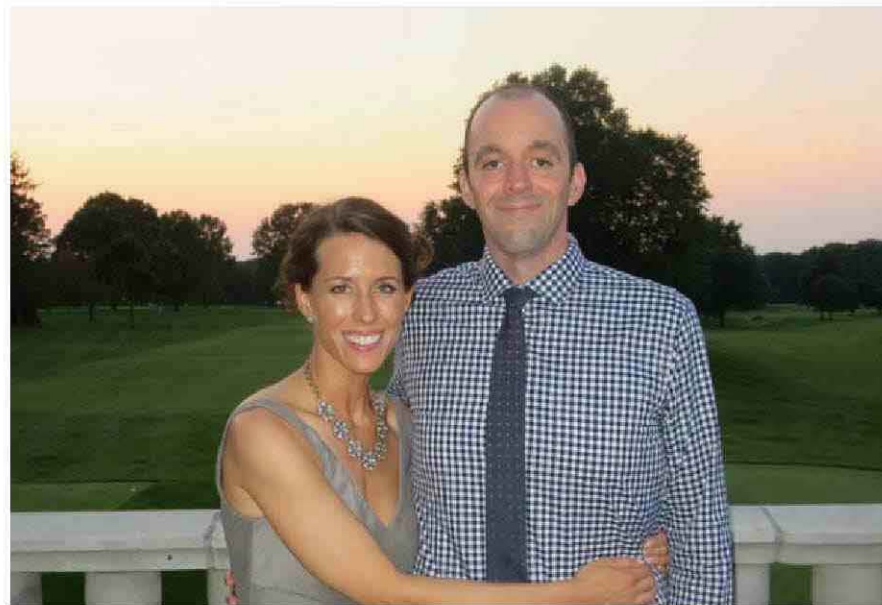
PHONE: (NA)



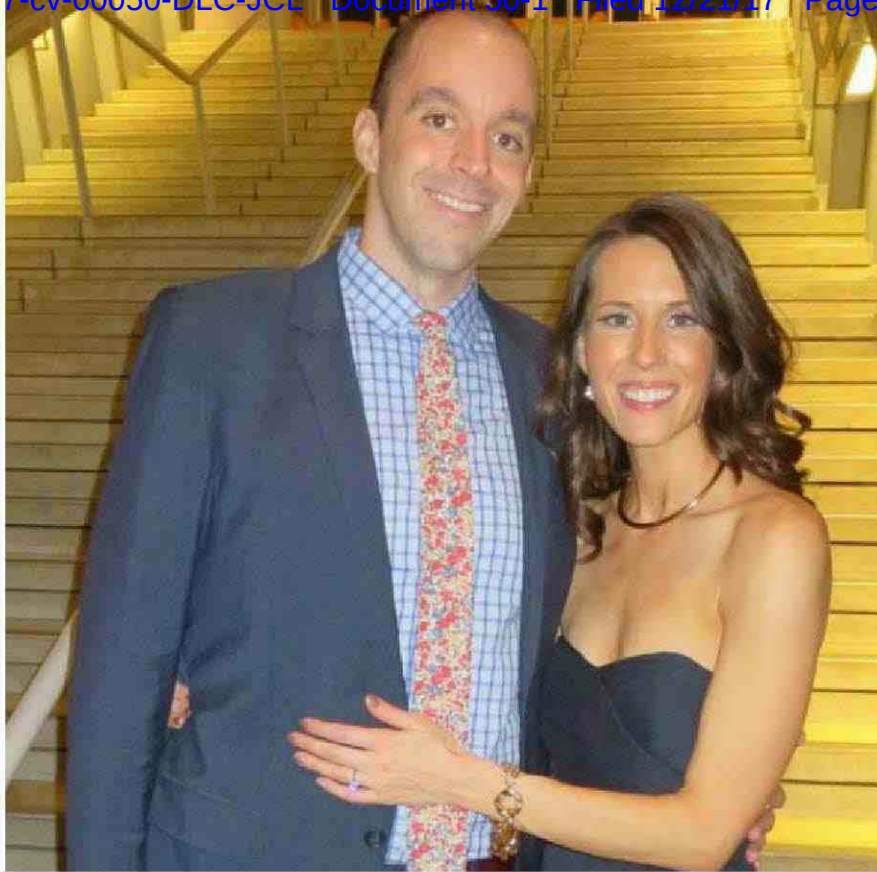
<https://archive.is/gd1Fo>



<https://archive.is/Oft1o>



<https://archive.is/oirOD>



<https://archive.is/ZfMNW>



<https://archive.is/lK8bd>

DAUGHTER: CLAIRE DOWNING (Age 1)

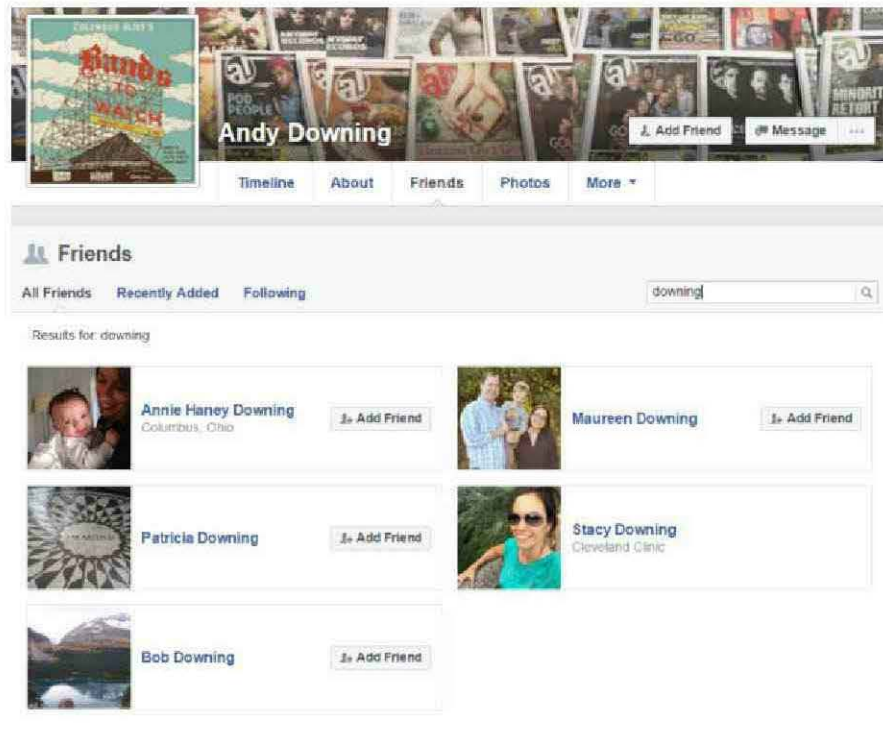


<https://archive.is/u7oT4>



<https://archive.is/XABg9>

OTHER FAMILY (RELATIONSHIPS UNKNOWN)



<https://archive.is/Z1udn>

Here is Andy's current cellphone number: (773) 960-4360.

Joel was clever enough not to give me his. But that one for Andy is definitely active.

TAKE ACTION!

So, give Andy a call.

Email them, call their families and ask questions, stop by their houses to inquire, whatever. Just ask some questions about their personal lives, their finances, and so on, and show your distaste for this hit-piece journalism, as well as their attempt to intimidate my family.

But don't respond with intimidation.

DON'T MAKE ANY THREATS and certainly DON'T DO ANYTHING PHYSICAL. If/when you go to their homes, simply make it clear that you are there to voice your problem with their snake-like behavior. If/when they ask you to leave, leave immediately.

If/when you call them, stop calling if/when they ask you to stop calling.

I preemptively disavow any threats of violence and preemptively double-disavow any acts of violence.

Obviously, I don't really even need to say that.

We are law-abiding men.

Every reader of the Daily Stormer is a confirmed good boy.

I have more information on these people's extended families I may publish in the future – including their wives' families. I may or may not publish all of that in the future.

Soon, we will open-up the libel laws and we will be able to sue journalists and make a lot of money – as well as force them to disclose confidential sources who say things like “oh yeah, he was wearing JNCOs and bashed his head against a sidewalk.”

Beyond that, I believe very strongly that we have a First Amendment case against the SPLC and the ADL for organizing for the explicit purpose of conspiracy to shut down protected speech. It's just a matter of finding people willing to take the case. In such a case, collaboration with journalists, such as those of Columbus Alive, to threaten and harass my family will be a subject of discovery. I don't think it would be impossible to show that the intent of these journalists in calling up the owners and managers of my dad's

building was to get them to end his lease as part of a sustained harassment campaign against me with the sole goal of stopping me from engaging in protected speech.

But we're not at that point yet.

So for now, all we can do is voice our discontent.

Understand that this is is not about me personally.

I am basically the only guy on the planet who is willing to go all-out on the Jews in the way that I do. At least the only guy I know of. David Duke and some others do a great job, but no one goes as hard as I do. Except weev, who also deals with the same crap I deal with.

And I'm sure there are others.

But I've put myself out there to be a tip of the spear, and say what all of you who are anonymous can't say because you aren't willing to give up your entire life, to suffer all of this harassment and defamation for the cause.

It's a whole nightmare, obviously, but the good part is, I enjoy the fight. I enjoy these people coming at me. Most people probably would not.

Remember that this is a war.

These people are trying to exterminate us.

And when they attack me, they are not attacking me. I don't matter. I'm just some random guy who has the nerve to say the things you all would say if you could.

They are attacking all of us. They are attacking our race, our very existence.

And we are not going to take it lying down.



This is a war.

And it is death or victory for all of us.

Hail Victory.